

EXHIBIT 46

**THIS EXHIBIT HAS BEEN
REDACTED IN ITS ENTIRETY**

EXHIBIT 47

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EXHIBIT 48

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EXHIBIT 49

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EXHIBIT 50

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EXHIBIT 51

FIRST AMENDMENT TO STATEMENT OF WORK

This First Amendment to Statement of Work is made this 29th day of February 2016 by and between **LegalEase Solutions LLC** ("Contractor") and **ROSS Intelligence, Inc.** ("Company") pursuant to a Master Services Agreement dated October 15, 2015 (the "MSA") between Company and Contractor.

RECITALS

WHEREAS Company and Contractor are party to a Statement of Work dated October 15, 2015 (the "Agreement");

WHEREAS Company and Contractor to amend and restate paragraphs 5 and 10 of the Agreement to reflect certain changes as mutually agreed between the Parties;

For valuable consideration, the receipt and sufficiency of which are hereby acknowledged, the Parties agree to amend the Agreement as follows:

1. Paragraph 5 of the Agreement is amended and restated as follows:

5. Payment: Payment made in advance at the beginning of each month or work period for the following 30 days of expected output. Company may pay the advance payment for the 30 days of expected output in two installments. LegalEase agrees to immediately refund any payments made for Answers not completed or approved by Company.

2. Paragraph 10 of the Agreement is amended and restated as follows:

10. Deliverables and delivery schedule: Contractor shall return 75 completed Answers to Company each week. This number may vary from month to month as mutually agreed upon between the Parties.

(SIGNATURE PAGE FOLLOWS)

TH
AA

Date: February 29, 2016

ROSS INTELLIGENCE, INC.

By: 

Name: Andrew Arruda

Title: Chief Executive Officer

Date: February 29, 2016

LEGALEASE SOLUTION LLC

By: 

Name: Tariq Hafeez

Title: President

Date: February 29, 2016

EXHIBIT 52

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EXHIBIT 53

**THIS EXHIBIT HAS BEEN
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EXHIBIT 54

**THIS EXHIBIT HAS BEEN
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EXHIBIT 55

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EXHIBIT 56

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EXHIBIT 57

West Key Number System®

Numerical List of Digest Topics

1	Abandoned and Lost Property	31	Appearance	70	Carriers
2	Abatement and Revival	34	Armed Services	71	Cemeteries
4	Abortion and Birth Control	35	Arrest	72	Census
5	Absentees	36	Arson	73	Certiorari
6	Abstracts of Title	37	Assault and Battery	74	Champerly and Maintenance
7	Accession	38	Assignments	75	Charities
8	Accord and Satisfaction	40	Assistance, Writ of	76	Chattel Mortgages
9	Account	41	Associations	76A	Chemical Dependents
10	Account, Action on	42	Assumpsit, Action of	76D	Child Custody
11	Account Stated	43	Asylums and Assisted Living Facilities	76E	Child Support
11A	Accountants	44	Attachment	76H	Children Out-of-Wedlock
12	Acknowledgment	45	Attorney and Client	78	Civil Rights
13	Action	46	Attorney General	79	Clerks of Courts
14	Action on the Case	47	Auctions and Auctioneers	80	Clubs
15	Adjoining Landowners	48	Audita Querela	81	Colleges and Universities
15A	Administrative Law and Procedure	48A	Automobiles	82	Collision
16	Admiralty	48B	Aviation	83	Commerce
17	Adoption	49	Bail	83H	Commodity Futures Trading Regulation
18	Adulteration	50	Bailment	83T	Common Interest Communities
19	Adultery	51	Bankruptcy	84	Common Lands
20	Adverse Possession	52	Banks and Banking	85	Common Law
21	Affidavits	54	Beneficial Associations	89	Compromise and Settlement
23	Agriculture	55	Bigamy	90	Confusion of Goods
24	Aliens, Immigration, and Citizenship	56	Bills and Notes	91	Conspiracy
25	Alteration of Instruments	58	Bonds	92	Constitutional Law
25T	Alternative Dispute Resolution	59	Boundaries	92B	Consumer Credit
26	Ambassadors and Consuls	60	Bounties	93	Contempt
27	Amicus Curiae	61	Breach of Marriage Promise	95	Contracts
28	Animals	63	Bribery	96	Contribution
29	Annuities	64	Bridges	96H	Controlled Substances
29T	Antitrust and Trade Regulation	65	Brokers	97C	Conversion and Civil Theft
30	Appeal and Error	66	Building and Loan Associations	98	Convicts
		67	Burglary	99	Copyrights and Intellectual Property
		69	Cancellation of Instruments		

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For free reference materials, visit **store.westlaw.com/westlaw/guides**.

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100	Coroners	136	Dower and Curtesy	178	Food	220	Internal Revenue
101	Corporations and Business Organizations	141	Easements	179	Forcible Entry and Detainer	221	International Law
102	Costs	142	Ejectment	180	Forfeitures	222	Interpleader
103	Counterfeiting	143	Election of Remedies	181	Forgery	223	Intoxicating Liquors
104	Counties	144	Elections	183	Franchises	224	Joint Adventures
105	Court Commissioners	145	Electricity	184	Fraud	226	Joint Tenancy
106	Courts	146	Embezzlement	185	Frauds, Statute of	227	Judges
107	Covenant, Action of	148	Eminent Domain	186	Fraudulent Conveyances	228	Judgment
108	Covenants	149	Entry, Writ of	187	Game	229	Judicial Sales
108A	Credit Reporting Agencies	149E	Environmental Law	188	Gaming	230	Jury
110	Criminal Law	149T	Equitable Conversion	189	Garnishment	231	Justices of the Peace
111	Crops	150	Equity	190	Gas	231E	Kidnapping
113	Customs and Usages	151	Escape	191	Gifts	231H	Labor and Employment
114	Customs Duties	152	Escheat	192	Good Will	233	Landlord and Tenant
115	Damages	154	Estates in Property	193	Grand Jury	234	Larceny
116	Dead Bodies	156	Estoppel	195	Guaranty	237	Libel and Slander
117	Death	157	Evidence	196	Guardian and Ward	238	Licenses
117G	Debt, Action of	158	Exceptions, Bill of	197	Habeas Corpus	239	Liens
117T	Debtor and Creditor	159	Exchange of Property	198	Hawkers and Peddlers	240	Life Estates
118A	Declaratory Judgment	160	Exchanges	198H	Health	241	Limitation of Actions
119	Dedication	161	Execution	200	Highways	242	Lis Pendens
120	Deeds	162	Executors and Administrators	201	Holidays	245	Logs and Logging
122A	Deposits and Escrows	163	Exemptions	202	Homestead	246	Lost Instruments
123	Deposits in Court	164	Explosives	203	Homicide	247	Lotteries
124	Descent and Distribution	165	Extortion and Threats	205	Husband and Wife	248	Malicious Mischief
125	Detectives and Security Guards	166	Extradition and Detainers	205H	Implied and Constructive Contracts	249	Malicious Prosecution
126	Detinue	167	Factors	206	Improvements	250	Mandamus
129	Disorderly Conduct	168	False Imprisonment	207	Incest	251	Manufactures
130	Disorderly House	169	False Personation	208	Indemnity	252	Maritime Liens
131	District and Prosecuting Attorneys	170	False Pretenses	209	Indians	253	Marriage
132	District of Columbia	170A	Federal Civil Procedure	210	Indictment and Information	256	Mayhem
133	Disturbance of Public Assemblage	170B	Federal Courts	211	Infants	257	Mechanics' Liens
134	Divorce	171	Fences	212	Injunction	257A	Mental Health
135	Domicile	172	Ferries	213	Innkeepers	258A	Military Justice
135H	Double Jeopardy	174	Fines	216	Inspection	259	Militia
		175	Fires	217	Insurance	260	Mines and Minerals
		176	Fish	218	Insurrection and Sedition	265	Monopolies
		177	Fixtures	219	Interest	266	Mortgages
						267	Motions
						268	Municipal Corporations

269	Names	313	Process	344	Salvage	379	Torts
271	Ne Exeat	313A	Products Liability	345	Schools	380	Towage
272	Negligence	314	Prohibition	346	Scire Facias	381	Towns
273	Neutrality Laws	315	Property	347	Seals	382T	Trademarks
274	Newspapers	315H	Prostitution	348	Seamen	384	Treason
275	New Trial	315P	Protection of Endangered Persons	349	Searches and Seizures	385	Treaties
276	Notaries	315T	Public Amusement and Entertainment	349A	Secured Transactions	386	Trespass
277	Notice	316E	Public Assistance	349B	Securities Regulation	387	Trespass to Try Title
278	Novation	316H	Public Contracts	350	Seduction	388	Trial
279	Nuisance	317	Public Lands	350H	Sentencing and Punishment	390	Trusts
280	Oath	317A	Public Utilities	351	Sequestration	391	Turnpikes and Toll Roads
281	Obscenity	318	Quieting Title	352	Set-Off and Counterclaim	392	Undertakings
282	Obstructing Justice	319	Quo Warranto	353	Sheriffs and Constables	392T	Unemployment Compensation
283	Officers and Public Employees	319H	Racketeer Influenced and Corrupt Organizations	354	Shipping	393	United States
284	Pardon and Parole	320	Railroads	355	Signatures	394	United States Magistrates
285	Parent and Child	321	Rape	356	Slaves	395	United States Marshals
286	Parliamentary Law	322	Real Actions	356A	Social Security and Public Welfare	396	Unlawful Assembly
287	Parties	323	Receivers	357	Sodomy	396A	Urban Railroads
288	Partition	324	Receiving Stolen Goods	358	Specific Performance	398	Usury
289	Partnership	325	Recognizances	359	Spendthrifts	399	Vagrancy
290	Party Walls	326	Records	360	States	400	Vendor and Purchaser
291	Patents	327	Reference	361	Statutes	401	Venue
294	Payment	328	Reformation of Instruments	362	Steam	402	War and National Emergency
295	Penalties	330	Registers of Deeds	363	Stipulations	403	Warehousemen
296	Pensions	331	Release	365	Submission of Controversy	404	Waste
297	Perjury	332	Religious Societies	366	Subrogation	405	Water Law
298	Perpetuities	333	Remainders	367	Subscriptions	406	Weapons
300	Pilots	334	Removal of Cases	368	Suicide	407	Weights and Measures
302	Pleading	335	Replevin	369	Sunday	408	Wharves
303	Pledges	336	Reports	370	Supersedeas	409	Wills
305	Possessory Warrant	337	Rescue	371	Taxation	410	Witnesses
306	Postal Service	338	Reversions	372	Telecommunications	411	Woods and Forests
307	Powers	339	Review	373	Tenancy in Common	413	Workers' Compensation
307A	Pretrial Procedure	340	Rewards	374	Tender	414	Zoning and Planning
308	Principal and Agent	341	Riot	375	Territories	450	Merit Systems Protection
309	Principal and Surety	342	Robbery	378	Time		
310	Prisons	343	Sales				
311	Private Roads						
311H	Privileged Communications and Confidentiality						

Searching by West Topic and Key Number

When you have identified a topic and key number associated with the legal issue you are researching, you can run a Terms and Connectors search using that topic and key number to quickly retrieve cases involving the same legal issue. A topic and key number search does not require a field-restricted format; that is, you do not need to include a field name or abbreviation as part of your search request. For example, to search for cases with headnotes classified under topic 343 (Sales) and key number 255 (Parties; Privity), type **343k255**.

To narrow your search, add search terms. For example, the query **343k255 /p contract** retrieves cases with headnotes classified under topic 343 and key number 255 that also contain the term *contract* in the same digest paragraph.

Topic field searching

You can also retrieve cases with headnotes classified under a specific West digest topic by using a topic field (to) restriction in your Terms and Connectors search. In addition to the topic name and number, the topic field contains the hierarchical classification information, key number, and text of the related key line. For example, to retrieve cases with headnotes classified under topic 409 (Wills), type **to(409)** or **to(wills)**. The broader search is **to(wills)** because it retrieves cases in which the term *wills* is mentioned in the key line or other levels of the hierarchy, even if the headnotes are not classified under topic 409. To narrow your search, add search terms; for example, type **to(409) /p "condition subsequent"**.

Using the West Key Number Digest (Custom Digest)

The West Key Number Digest, also called the Custom Digest, contains the complete topic and key number outline used by West attorney-editors to classify headnotes. The West Key Number Digest helps you identify topic and key numbers related to your issue and retrieve cases with headnotes classified under those topic and key numbers.

To access the West Key Number Digest, click **Key Numbers** at the top of any page, then click **West Key Number Digest Outline** under *Browse Key Numbers*. (Alternatively, click **Custom Digest** at a case law database Search page.) To browse the digest, click the plus (+) and minus (–) symbols.

In addition to browsing the West Key Number Digest for relevant topic and key numbers, you can also search for them using the Search for Key Numbers feature.

To use the Search for Key Numbers feature, complete these steps:

1. Click **Key Numbers** at the top of any page. A page is displayed that contains the *Search for Key Numbers* text box.
2. Type your terms, e.g., **family and medical leave**, in the text box.
3. To change the jurisdiction from which you retrieve case headnotes, click **Change Jurisdiction**, then select the check boxes next to the jurisdictions you want and click **Done**.
4. Click **Search**. A list of topic and key numbers is displayed.
5. Click a topic and key number to view the headnotes classified under that topic and key number. Or select the check boxes next to one or more topic and key numbers and click **Search Selected** to view the headnotes classified under those topic and key numbers.

Digest Topics by Specialty

Alternative Dispute Resolution

25T Alternative Dispute Resolution

76D Child Custody

217 Insurance

231H Labor and Employment

233 Landlord and Tenant

289 Partnership

354 Shipping

Antitrust

29T Antitrust and Trade Regulation

Bankruptcy

51 Bankruptcy

117T Debtor and Creditor

163 Exemptions

202 Homestead

349A Secured Transactions

Business and Other Organizations

41 Associations

52 Banks and Banking

54 Beneficial Associations

65 Brokers

66 Building and Loan Associations

70 Carriers

71 Cemeteries

75 Charities

80 Clubs

81 Colleges and Universities

83T Common Interest Communities

101 Corporations and Business Organizations

108A Credit Reporting Agencies

145 Electricity

167 Factors

190 Gas

213 Innkeepers

217 Insurance

224 Joint Ventures

289 Partnership

317A Public Utilities

320 Railroads

332 Religious Societies

345 Schools

372 Telecommunications

396A Urban Railroads

Civil Procedure—Federal Cases

2 Abatement and Revival

13 Action

25T Alternative Dispute Resolution

48 Audita Querela

96 Contribution

106 Courts

115 Damages

118A Declaratory Judgment

135 Domicile

143 Election of Remedies

156 Estoppel

157 Evidence

158 Exceptions, Bill of

170A Federal Civil Procedure

170B Federal Courts

197 Habeas Corpus

212 Injunction

222 Interpleader

227 Judges

228 Judgment

230 Jury

241 Limitation of Actions

250 Mandamus

311H Privileged Communications and Confidentiality

314 Prohibition

319 Quo Warranto

334 Removal of Cases

378 Time

394 United States Magistrates

410 Witnesses

Civil Procedure—State Cases

2 Abatement and Revival

13 Action

21 Affidavits

25T Alternative Dispute Resolution

30 Appeal and Error

31 Appearance

44 Attachment

48 Audita Querela

73 Certiorari

96 Contribution

105 Court Commissioners

106 Courts

115 Damages

118A Declaratory Judgment

123 Deposits in Court

135 Domicile

143 Election of Remedies

150 Equity

156 Estoppel

157 Evidence

158 Exceptions, Bill of

161 Execution

189 Garnishment

197 Habeas Corpus

212 Injunction

222 Interpleader

227 Judges

228 Judgment

230 Jury

231 Justices of the Peace

241 Limitation of Actions

242 Lis Pendens

250 Mandamus

267 Motions

271 Ne Exeat

275 New Trial

277 Notice

287 Parties

302 Pleading

307A Pretrial Procedure

311H Privileged Communications and Confidentiality

313 Process

314 Prohibition

319 Quo Warranto

322 Real Actions

327 Reference

334 Removal of Cases

339 Review

346 Scire Facias

351 Sequestration

352 Set-Off and Counterclaim

363 Stipulations

370 Supersedeas

378 Time

388 Trial

401 Venue

410 Witnesses

Commercial Law

29T Antitrust and Trade Regulation

38 Assignments

51 Bankruptcy

52 Banks and Banking

56 Bills and Notes

70 Carriers

76 Chattel Mortgages

92B Consumer Credit

95 Contracts

117T Debtor and Creditor

186	Fraudulent Conveyances	149E	Environmental Law	324	Receiving Stolen Goods	317A	Public Utilities
219	Interest	151	Escape	337	Rescue	362	Steam
278	Novation	164	Explosives	341	Riot	402	War and National Emergency
294	Payment	165	Extortion and Threats	342	Robbery	Environmental Law	
303	Pledges	166	Extradition and Detainers	349	Searches and Seizures	23	Agriculture
343	Sales	168	False Imprisonment	350	Seduction	145	Electricity
349A	Secured Transactions	169	False Personation	350H	Sentencing and Punishment	149E	Environmental Law
403	Warehousemen	170	False Pretenses	357	Sodomy	260	Mines and Minerals
Communications		174	Fines	368	Suicide	279	Nuisance
92	Constitutional Law	175	Fires	384	Treason	405	Water Law
99	Copyrights and Intellectual Property	180	Forfeitures	396	Unlawful Assembly	414	Zoning and Planning
237	Libel and Slander	181	Forgery	399	Vagrancy	Estate Planning	
306	Postal Service	184	Fraud	406	Weapons	17	Adoption
311H	Privileged Communications and Confidentiality	193	Grand Jury	410	Witnesses	75	Charities
372	Telecommunications	197	Habeas Corpus	Education		76H	Children Out-of-Wedlock
Criminal Justice		198H	Health	81	Colleges and Universities	124	Descent and Distribution
18	Adulteration	203	Homicide	345	Schools	136	Dower and Curtesy
19	Adultery	207	Incest	Employment Law		154	Estates in Property
35	Arrest	209	Indians	78	Civil Rights	162	Executors and Administrators
36	Arson	210	Indictment and Information	81	Colleges and Universities	191	Gifts
37	Assault and Battery	211	Infants	104	Counties	220	Internal Revenue
55	Bigamy	218	Insurrection and Sedition	198H	Health	226	Joint Tenancy
63	Bribery	231E	Kidnapping	231H	Labor and Employment	240	Life Estates
67	Burglary	234	Larceny	268	Municipal Corporations	298	Perpetuities
76A	Chemical Dependents	248	Malicious Mischief	283	Officers and Public Employees	307	Powers
91	Conspiracy	256	Mayhem	345	Schools	333	Remainders
96H	Controlled Substances	273	Neutrality Laws	356A	Social Security and Public Welfare	338	Reversions
98	Convicts	281	Obscenity	360	States	371	Taxation
103	Counterfeiting	282	Obstructing Justice	381	Towns	373	Tenancy in Common
110	Criminal Law	284	Pardon and Parole	392T	Unemployment Compensation	390	Trusts
129	Disorderly Conduct	297	Perjury	393	United States	409	Wills
130	Disorderly House	300	Prisons	413	Workers' Compensation	Family Law	
131	District and Prosecuting Attorneys	311H	Privileged Communications and Confidentiality	Energy		4	Abortion and Birth Control
133	Disturbance of Public Assemblage	315H	Prostitution	145	Electricity	17	Adoption
135H	Double Jeopardy	315P	Protection of Endangered Persons	190	Gas	19	Adultery
146	Embezzlement	319H	Racketeer Influenced and Corrupt Organizations	260	Mines and Minerals	55	Bigamy
		321	Rape			61	Breach of Marriage Promise

76H Children Out-of-Wedlock	257A Mental Health	231 Justices of the Peace	Real Property
134 Divorce	315P Protection of Endangered Persons	276 Notaries	6 Abstracts of Title
136 Dower and Curtesy	Immigration and Citizenship	327 Reference	7 Accession
196 Guardian and Ward	24 Aliens, Immigration, and Citizenship	394 United States Magistrates	15 Adjoining Landowners
205 Husband and Wife	Insurance	Maritime Law	20 Adverse Possession
207 Incest	217 Insurance	16 Admiralty	59 Boundaries
211 Infants	356A Social Security and Public Welfare	82 Collision	65 Brokers
253 Marriage	392T Unemployment Compensation	172 Ferries	66 Building and Loan Associations
285 Parent and Child	413 Workers' Compensation	252 Maritime Liens	83T Common Interest Communities
315P Protection of Endangered Persons	Intellectual Property	300 Pilots	84 Common Lands
350 Seduction	29T Antitrust and Trade Regulation	344 Salvage	108 Covenants
Financial Institutions	99 Copyrights and Intellectual Property	348 Seamen	119 Dedication
52 Banks and Banking	291 Patents	354 Shipping	120 Deeds
66 Building and Loan Associations	382T Trademarks	405 Water Law	141 Easements
92B Consumer Credit	International Issues	408 Wharves	142 Ejectment
108A Credit Reporting Agencies	24 Aliens, Immigration, and Citizenship	Medicaid	148 Eminent Domain
217 Insurance	26 Ambassadors and Consuls	198H Health	149 Entry, Writ of
Government	114 Customs Duties	Medicare	149T Equitable Conversion
64 Bridges	221 International Law	Military Law	154 Estates in Property
81 Colleges and Universities	385 Treaties	34 Armed Services	171 Fences
104 Counties	402 War and National Emergency	258A Military Justice	177 Fixtures
132 District of Columbia	Juvenile Justice	259 Militia	179 Forcible Entry and Detainer
200 Highways	211 Infants	402 War and National Emergency	206 Improvements
268 Municipal Corporations	Legal Services	Products Liability	233 Landlord and Tenant
316E Public Assistance	12 Acknowledgement	145 Electricity	238 Licenses
316H Public Contracts	25T Alternative Dispute Resolution	164 Explosives	239 Liens
345 Schools	45 Attorney and Client	178 Food	242 Lis Pendens
360 States	46 Attorney General	190 Gas	257 Mechanics' Liens
375 Territories	79 Clerks of Courts	313A Products Liability	266 Mortgages
381 Towns	105 Court Commissioners	Professional Malpractice	272 Negligence
393 United States	106 Courts	11A Accountants	288 Partition
405 Water Law	131 District and Prosecuting Attorneys	45 Attorney and Client	290 Party Walls
Health	227 Judges	65 Brokers	311 Private Roads
76A Chemical Dependents		198H Health	315 Property
96H Controlled Substances		211 Infants	315T Public Amusement and Entertainment
198H Health		257A Mental Health	317 Public Lands
		272 Negligence	318 Quieting Title
		332 Religious Societies	
		345 Schools	

322	Real Actions	238	Licenses	178	Food	406	Weapons
330	Registers of Deeds	268	Municipal Corporations	179	Forcible Entry and Detainer	Transportation	
338	Reversions	345	Schools	184	Fraud	16	Admiralty
358	Specific Performance	371	Taxation	190	Gas	48A	Automobiles
386	Trespass	381	Towns	198H	Health	48B	Aviation
387	Trespass to Try Title	Torts		213	Innkeepers	64	Bridges
400	Vendor and Purchaser	37	Assault and Battery	233	Landlord and Tenant	70	Carriers
405	Water Law	45	Attorney and Client	237	Libel and Slander	82	Collision
414	Zoning and Planning	48A	Automobiles	249	Malicious Prosecution	83	Commerce
	Securities and Commodities Regulations	48B	Aviation	272	Negligence	172	Ferries
83H	Commodity Futures Trading Regulation	52	Banks and Banking	279	Nuisance	200	Highways
160	Exchanges	70	Carriers	313A	Products Liability	320	Railroads
349B	Securities Regulation	78	Civil Rights	315T	Public Amusement and Entertainment	348	Seamen
	Taxation	97C	Conversion and Civil Theft	320	Railroads	354	Shipping
83	Commerce	115	Damages	350	Seduction	391	Turnpikes and Toll Roads
104	Counties	117	Death	354	Shipping	396A	Urban Railroads
220	Internal Revenue	145	Electricity	379	Torts	405	Water Law
223	Intoxicating Liquors	164	Explosives	386	Trespass	Unemployment Compensation	
		168	False Imprisonment	404	Waste	392T	Unemployment Compensation

EXHIBIT 58

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EXHIBIT 60

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EXHIBIT 61

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EXHIBIT 62

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EXHIBIT 63



Project Rose – Project Protocol

Project Rose
Project Protocol

DRAFT

Updated	19 November 2017
Version	1.1 Working
Document Classification	RESTRICTED
Status	Draft/Working
Author	Christopher Cahn

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Project Rose – Project Protocol

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1.4 QUESTION RESPONSES.....3

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Project Rose – Project Protocol

1. INTRODUCTION

1.1 BACKGROUND

Our client is assisting an artificial intelligence company train its system to identify and distinguish quality legal cases without the need significant intervention from human end users.

We will formulate questions based upon Westlaw headnotes and provide sample responses in a pre-determined format. The questions and responses will subsequently be “processed” by a computer so proper formatting is of critical importance.

1.2 ORDER OF REVIEW

Topics will be assigned based upon the Westlaw key system. At the top level will be the Westlaw key topic e.g. 298 Perpetuities. Within each key will be individual keys and within each key will be a list of cases that each have headnotes. We will prepare a memo for every unique headnote that appears under a given Westlaw Key.

For example, for topic 298 Perpetuities, Key 2- “What law Governs” there are 42 cases with headnotes so we would prepare 42 memos.

Never select a resource that is labelled as “Out of Plan”.

1.3 QUESTION FORMATION

Initially questions are formulated based upon the Westlaw headnote. For example, the below headnote:

Headnote: The common law rule against perpetuities is in force in Oregon.

Might lead to the question, “Is the common law rule against perpetuities in force?”

Once memo drafting beings, it is permissible to change the question to better suit the cases found but, each question must be unique.

Additional requirements for questions:

- Questions must not start with the word, “may”
- Questions must not be state specific (but answers can be state specific)
- Questions should be based upon headnotes but framed to be concise. If the question runs more than 2 lines it is probably too long.

1.4 QUESTION RESPONSES

For each question, we will provide quotes that respond to the question. Memos are being used to train a computer system rather than for actual legal research. Negative treatment of a case - whether distinguished or overturned - is not relevant. Overturned cases can still be quoted and the fact that it is overturned need not be mentioned. Please also note that question responses are judged by whether they contain the same keywords as the question. Synonyms for the keywords and responses that answer substantive issue but do not contain the same keywords are not consider acceptable substitutes for the actual keywords.



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Quotes are classified in four ways, great, good, topical and irrelevant.

- Each memo will contain at least one “great” quote.
- Memos will also contain exactly one topical and one irrelevant quote
- Memos must contain 4- 6 quotes in total.
 - Never less than 4 and never more than 6.
 - 5-6 quotes is optimal.
- The entire paragraph should be copied into the memo but the actual quote should not be overly wordy. Try to be surgical; **if your quote is more than two lines it is probably too long**
- Paragraphs should not be overly lengthy. If a paragraph runs more than 10 lines, it is too long and an alternate quote should be found.
- Great, Good and Topical quotes should be substantive rather than factual

Comment [MS1]: The rule of entire para had been revised by the client, and intimated to Clutch on Nov. 14, 2017.

“Great” quote – Answers every aspect of the question using the same keywords.

Question: “Are oil and gas leases executory contracts?”

Answer: “Any party to an ‘executory contract,’ such as a long-term supply contract or an oil and gas operating agreement, may similarly obtain from the debtor full performance plus additional ‘assurance’ as the quid pro quo for continued dealings.”) King v. Baer, 482 F.2d 552 (10th Cir.1973) (emphasis mine). **[[Other courts have considered an oil and gas lease a transfer of an interest in real property and therefore not an executory contract]].**”

“Good” quote - Should answer the most essential element of the question and contain all but one keyword

Question: “Does a person commit forgery by opening an account and signing checks in an assumed name?”

Answer: One cannot conclude that the defendant in this case committed forgery as defined in Susalla. There may have been a litany of offenses committed, but not forgery. The check given by defendant did not purport to be anything other than a personal check drawn by the person who presented it on an account that that person had opened. **[[The misrepresentation of identity to the bank in opening the account did not make the creation of a draft on that account a forgery when presented to pay for the television.]]** See, *Rapp v. State*, 274 So.2d 18 (Fla.App., 1973), *Smith v. State*, 379 S.W.2d 326 (Tex.Cr.App., 1964).

“Topical” and “Irrelevant” quote.

In addition to the 2-4 great or good answers (quotes) to each research question, we will need one “topical” quote and one “irrelevant” quote.

“Topical” quote

A topical quote is a quote that hits on limited aspects of the question, but does not answer any essential part of the question. Examples of good topical quotes are a definition of one of the key words or background of the law.

For example:



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Question: 'Are oil and gas leases executory contracts?'

Answer: 'There are no published opinions construing this language. However, by its terms, the paragraph deals with interests of the debtor in 'gaseous hydrocarbons' and not contract rights like the ones involved here. **[[The legislative history of § 541(b)(4) indicates that it was enacted to address questions related to the transfer of rights in oil and gas leases.]]**

The easiest way to find topical cases is to look for cases within the case cited...as they are citing law. This will provide a foundation. And, by clicking on a case within one of your cited cases, you will save time.

- Touches on the elements of the question
- Does not answer the question
- May contain a limited component of the question
- Not necessary to have a key word of the question

“Irrelevant” quote:

An irrelevant quote has some keywords in it from the question but completely missed the mark. An easy way to find irrelevant quotes is to search a keyword, pick any case, and use a quote from the facts or body with the key word. This quote is not at all on topic and will likely only contain one essential word. The easiest way to locate a good irrelevant quote is to pick a key word from the question, search only that word in WestLaw/Lexis, find a case with that word in the facts with little to no other words from the question, bracket and bold the sentence with the word.

For example, if the question is “[a]re oil and gas leases executory contracts?” an answer may contain key words like “olive oil” or “residential leases” but nothing else relevant regarding the question.

The easiest way to locate a good irrelevant quote is to pick a key word from the question, search only that word in WestLaw, find a case with that word in the facts with little to no other words from the question, bracket and bold the sentence with the word.

An Irrelevant quote:

- One or two matching words with the question, but completely unrelated.
- Has key word but not within realm of the issue presented (example question on oil and gas lease, irrelevant quote about olive oil).

1.5 FORMATTING

Memos will be machine read which means that formatting is of critical importance. At the most basic level the memos must conform to the below:

- Single Spaced
- Left Justified
- Times New Roman, Font 12
- No italics
- Eliminate Special characters and other formatting issues (eliminate *,¶, unusual spaces, footnotes, unwanted squiggly lines).
- No underlining



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- Cases Sequentially Numbers (i.e. Case 1, Case 2, Case 3, etc)
- Check if Great, Good, Topical and Irrelevant are in order and properly titled.
- Check if the memo number in the file name is unique and that it matches the number in the body of the memo.

More broadly, the memos will conform to the following:

Issue	Description
1	Draft questions following Creative Process. <ul style="list-style-type: none"> • Questions must <u>not</u> start with the word, “may” • Questions must not be state specific • Questions should be based upon headnotes but framed to be concise. If the question runs more than 2 lines it is probably too long. • Is the question grammatically correct?
2	Research questions using online resources and accounts. Only a basic case cite should be provided – No pin point or alternate cites Kirquel Dev., Ltd. v. Planning Bd. of Town of Cortlandt, 96 A.D.3d 754.
3	Memo title and number centered and bold. MEMORANDUM # 23
4	Left justify the balance of the memo
5	Confirm the font and spacing of the memo is appropriate. <u>Nothing</u> should be italicized or underlined.
7	Does the memo number at the top of the memo match the number in the file name?
8	The Issue and the quotes must be in bold. No other text should be in bold.
9	Quotes are to be in double brackets, all punctuation inside of the brackets, and bold font. No highlighting. The end of the quote must include punctuation and cites should not be included in the quote UNLESS it is required in order to have the quote end with punctuation. [[This result would present due process concerns and is clearly not what the Legislature intended.]]
10	All quotes must be identical to the one found in the case unless otherwise noted here, no stray words, missing punctuation, or carriage returns. *Westlaw internal page numbers must be eliminated.
11	Ensure <u>bracket spacing</u> is correct, before and after brackets, and <u>bold font</u> is limited to the bracketed quote. No highlighting.
12	Quotes should not all be from the same ruling or case.
13	Bracketed language must be a <u>full sentence</u> . Not just two words.
14	Label quotes as great (1-4), good (2-3), topical (1), and irrelevant (1) for a total of 4-6 quotes. Case 4: Winston v. Freshwater Wetlands Appeals Bd., 254 A.D.2d 363. Good Quote 1: text text text
15	GREAT –The bracketed language must answer question and must contain all the essential keywords of the question. Note: Synonyms are not considered the same key word
16	GOOD – The bracketed language must answer question and must contain most of the the essential keywords of the question.
17	TOPICAL – foundation quote, background information.
18	IRRELEVANT– has no reference or relevance but includes one key word from the

Comment [MS2]: Identical in the way it appears in WL; do not use identical quotes (where all the quotes of the memo are identical).



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	question.
19	Memo saved in correct format – naming convention (Topic – Memo # - C (for clutch) - associate initials). When saving after review include your initials. Venue – Memo # 23 – C - AA
20	Tracker Updated
21	Watch out for 1: Grammar – question, missing period 2: Format – bold, spacing, pagination 3: Great/Good – quote mislabelled 4: Topical – quote should not answer the question but should provide background knowledge 5: Irrelevant – quote is irrelevant



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2. EXAMPLE MEMO

MEMORANDUM # 57

1. Question

Is equitable relief a cause of action?

2. Reference List

Issue: Is equitable relief a cause of action?

Case 1: Hendrix v. Napolitano, 77 F. Supp. 3d 188.

Great Quote 1: Mr. Hendrix asserts a claim for equitable relief in Count V. **[[Equitable relief, however, is a form of relief and not a cause of action.]]** Since the Court grants the motion for summary judgment as to Count IV, there is no cause of action in this matter upon which it could grant any equitable relief. The Court, therefore, dismisses Count V for failure to state a claim upon which relief can be granted.

Case 2: Eisenberg v. City of Miami Beach, 1 F. Supp. 3d 1327.

Great Quote 1: **[[The equitable relief Plaintiffs seek is a remedy, not a separate cause of action.]]** See Perret v. Wyndham Vacation Resorts, Inc., 889 F.Supp.2d 1333, 1346 (S.D.Fla.2012) (dismissing count pleading injunctive and declaratory relief for failure to state a separate cause of action); Tara Prods., Inc. v. Hollywood Gadgets, Inc., No. 09–CV–61436, 2010 WL 1531489, at (S.D.Fla. Apr. 16, 2010) (dismissing count pleading remedy of equitable lien for failure to state separate cause of action); see also Alabama v. U.S. Army Corps of Eng'rs, 424 F.3d 1117, 1127 (11th Cir.2005) (“[A]ny motion or suit for either a preliminary or permanent injunction must be based upon a cause of action ... There is no such thing as a suit for a traditional injunction in the abstract.”) (internal quotation marks and citation omitted). Moreover, “[A] court should not entertain an action for declaratory relief when the issues are properly raised in other counts of the pleadings and are already before the court.” Perret, 889 F.Supp.2d at 1346 (citation omitted). Plaintiffs already seek equitable relief in the other counts of the Complaint. Accordingly, Count VII is dismissed.

Case 3: Crown Const. Co. v. Huddleston, 961 S.W.2d 552.

Topical Quote 1: In this case, the evidence, other than whether the notice was taped to Huddleston's door on June 2, 1996, is undisputed. Crown acknowledges that it was aware, prior to June 2, 1996, that the option expired on that date. It also acknowledges that after it allegedly taped the notice to Huddleston's office door, it did not attempt to contact Huddleston again until June 12, 1996. Then, on June 12, 1996, Crown delivered notice in writing to Huddleston's agent. Crown never confirmed receipt of the June 2 notice. **[[In the face of undisputed facts, the propriety of equitable relief is a question of law for the court, subject to an abuse of discretion standard of review on appeal. Fontenot, 919 S.W.2d at 715.]]** Because the facts surrounding Crown's equitable argument are undisputed, Crown's third point of error alleging that a fact issue exists regarding whether equity should be applied in this case is overruled. We must now consider, whether the trial court erred in finding that Crown was not entitled to equitable relief as a matter of law.

Case 4: Beard v. Glickman, 189 F. Supp. 2d 994.

Irrelevant Quote 1: In their Reply, the Beards argue that if we accept Defendant's interpretation, the Agency can completely undermine an appellant's right to appeal a denial of equitable relief by simply failing to recommend such relief to the Administrator. We disagree.

[[There can only be a denial of equitable relief if the party in question has the authority to



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actually grant equitable relief.]] Under the construction of the relevant statutes and regulations, only certain Administrators within the FSA (the head Administrator, Associate Administrator and Deputy Administrator) and the Director of the NAD, as well as, of course, the Secretary of Agriculture, have the authority to grant equitable relief. Thus there could be no denial of equitable relief appealed to the NAD Director in cases where, as here, the appellants chose to bypass the intermediate options of Agency review before appealing directly to the NAD. Therefore, accepting Defendant's interpretation does not undermine an appellant's right to appeal a denial of equitable relief.

-- End of Document --

EXHIBIT 64

**THIS EXHIBIT HAS BEEN
REDACTED IN ITS ENTIRETY**

EXHIBIT 65

**THIS EXHIBIT HAS BEEN
REDACTED IN ITS ENTIRETY**

EXHIBIT 66

**THIS EXHIBIT HAS BEEN
REDACTED IN ITS ENTIRETY**